

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

Rambo

UNITED STATES OF AMERICA

v.

KAYODE KASSIM,
FELIX MORDI,
ABEL OGUNFUNWA, and
JAMES UGOH

CRIMINAL No. 09-356

(Judge Rambo)
(under seal)

INDICTMENT

The Grand Jury Charges:

COUNT 1

(Conspiracy to Commit Mail Fraud,
Wire Fraud & Money Laundering)

FILED
HARRISBURG, PA
OCT 28 2009

MARY E. D'ANDREA, CLERK
Deputy Clerk

I. BACKGROUND

A. The MoneyGram International Money Transfer System

1. At all times pertinent to this Indictment, MoneyGram International, hereinafter referred to as "MoneyGram," was a publicly traded, global money transfer company. The MoneyGram network consisted of approximately 180,000 Agents, sometimes referred to as Outlets, in 190 countries and territories. MoneyGram's international headquarters was located in Minneapolis, Minnesota.

2. In order to transfer money via MoneyGram, senders were required to present cash and complete a handwritten application, known as a "Send" form at an authorized MoneyGram Agent location. The sender was required to list the amount of the transfer, the name of the payee (receiver), the expected payout location, and their own name, telephone number and address on the "Send" form. The MoneyGram Agent collected the money transfer amount, plus a money transfer fee from the sender, and entered the sender's biographical and identification data, along with the name of the intended payee into the MoneyGram transactional data base. MoneyGram assigned an 8 digit reference number to the transaction.

3. In order to receive the transfer, the payee had to physically enter an authorized MoneyGram Agent location (Outlet) and complete a handwritten application, known as a "Receive" form. The payee was directed to list their own address and telephone number, and the name, city and state of the sender and the expected money transfer amount on the "Receive" form. It was optional for the payee to list the 8 digit reference number. The payee presented the completed "Receive" form to the MoneyGram Agent.

4. The MoneyGram Agent was required to query the MoneyGram transactional data base to determine whether the money transfer had been sent by the sender identified by the payee. For all money transfers in an amount equal to

or greater than \$900, the payee was required to present a valid identification document for examination by the MoneyGram Agent. The MoneyGram Agent was required to enter the payee name, address, telephone number, and identification document serial number into the MoneyGram transactional data base. Most MoneyGram Agents were required to issue a check payable to the payee to further document the transaction. The MoneyGram Agent could then cash the check after endorsement by the payee.

B. The Defendants

5. The defendant, KAYODE KASSIM, was a resident of Ontario, Canada. Beginning on October 25, 2006, KASSIM owned and operated a MoneyGram Outlet named "Klazz Beauty Salon" at 1920 Eglinton Avenue, Toronto, Canada, until it was closed by MoneyGram for materially elevated numbers of fraud complaints. KAYOTE KASSIM also controlled checking accounts under the name of Klazz Beauty Salon and "KC Money Transfer, Inc." at the Bank of Montreal.

6. The defendant, ABEL OGUNFUNWA, was a resident of Ontario, Canada who owned two MoneyGram Outlets, the "All In One Store" at 1613 Eglinton Avenue West, Toronto, and "Video Suppermart Store" at 1950 Eglinton Avenue West, Toronto. All in One Store became operational on or about December 27, 2007. Video Suppermart was open for business from October 10,

2007 until March 3, 2009, when both All In One and Video Suppermart were closed by MoneyGram due to high levels of fraud complaints.

7. The defendant, FELIX MORDI, was a resident of Ontario, Canada who owned and operated a MoneyGram Outlet by the name of "Modicom Accounting Services," first at 672 Jane Street, Toronto and later at 1017 Weston Road, Toronto. Modicom Accounting Services became operational as a MoneyGram Outlet at 672 Jane Street in May of 2005. MORDI also controlled two checking accounts under the name of Modicom Accounting Services at the Scotia Bank and SO-USE Credit Union. Another MoneyGram Outlet, "EBI Rentals," became operational at 1017 Weston Road, Toronto in October 2006. On or about March 31, 2009, MoneyGram closed EBI Rentals due to high levels of fraud complaints.

8. The defendant, JAMES UGOH, was a resident of Ontario, Canada who owned eleven (11) MoneyGram outlets under the name of "Money Spot" in the Greater Toronto Area. These Money Spot outlets were operational between December of 2001 and February 16, 2009, when MoneyGram closed them and a twelfth outlet owned by UGOH's wife, N & E Associates and Financial, due to high levels of fraud complaints.

II. THE CONSPIRACY

9. Between January of 2004 and April of 2009, in the Middle District of Pennsylvania and elsewhere, the defendants,

**KAYODE KASSIM,
FELIX MORDI,
ABEL OGUNFUNWA, and
JAMES UGOH**

and other conspirators, known and unknown to the Grand Jury, did knowingly and willfully conspire and agree together, and with one another, to commit offenses against the United States; to wit, MAIL FRAUD, 18 USC § 1341; WIRE FRAUD, 18 U.S.C. §1343; and LAUNDERING OF MONETARY INSTRUMENTS, 18 U.S.C. §1956, and any one or more of such persons committed overt acts to effect the objects of the conspiracy, in violation of Title 18 , United States Code, Section 371.

III. THE MANNER & MEANS OF THE CONSPIRACY

10. It was part of their conspiracy and their schemes to defraud that the defendants and their conspirators did obtain money and property; to wit, in excess of \$8,000,000, from thousands of victims, many of whom resided in the United States and the Middle District of Pennsylvania, through fraudulent schemes in which the defendants and their co-conspirators would falsely promise their victims cash prizes, awards, loans, and other compensation in connection with various forms of international, mass marketing fraud schemes.

11. It was part of their conspiracy and their schemes to defraud that the victims were told by the defendants and their co-conspirators that in order to receive the cash prizes, awards, loans or other compensation, they were required to make advance payments, which the defendants and co-conspirators typically characterized as "taxes," "customs' duties," "insurance," "security deposits," or "processing fees," dependent upon the nature of the underlying scheme.

12. It was also part of their conspiracy and their schemes to defraud that the defendants and their co-conspirators would deliver counterfeit checks payable to the victims via the U.S. Mail or other means to fund the advance payments. The victims were directed to cash the counterfeit checks or deposit them into their personal accounts and immediately wire a portion of the proceeds via MoneyGram to a fictitious, named payee. The defendants and their co-conspirators would falsely represent to the victims that the fictitious payee was a bona-fide representative of a legitimate business enterprise or governmental agency.

13. After the victims completed the MoneyGram money transfers, the defendants and their co-conspirators would convert the transfers to their own use and fail to distribute the cash prizes, awards, loans or other compensation as they had promised. Eventually, the counterfeit checks cashed and/or deposited by the victims were returned unpaid, and the victims were responsible for reimbursing the banks or other entities that accepted or cashed the checks.

14. It was also part of their conspiracy and their schemes to defraud that the defendants and their co-conspirators would enter false addresses, telephone numbers and personal identification document information into the MoneyGram transactional data-base. In so doing the defendants and their co-conspirators concealed their true identity, as well as the ownership and control of the fraudulently obtained monies.

15. It was also part of their conspiracy and their schemes to defraud that the defendants and their co-conspirators would convert the victims' MoneyGram transfers to their own use with the assistance of other complicit MoneyGram Agents, as described below:

The complicit MoneyGram Agents would enter false payee addresses, telephone numbers and identification document information into the MoneyGram transactional data-base, thereby maintaining the anonymity of the fraudsters, and creating the illusion that a bona-fide payee had physically entered the receiving Outlet.

The complicit MoneyGram Agents did not require the mass marketers to complete MoneyGram "Receive" forms or endorse MoneyGram receipts and checks issued incident to the transactions.

Instead of issuing MoneyGram checks payable to each individual fictitious payee, the complicit MoneyGram Agents issued checks made payable to a single payee, invariably a business they controlled. This practice, known as "check pooling," allowed the conspirators to collect MoneyGram checks at multiple outlets, deposit those checks into what otherwise appeared to be legitimate bank accounts, and then ultimately withdraw

and distribute the proceeds to the defendants and their co-conspirators. In order to avoid detection, the conspirators employed multiple "check pooling" payees, and "check pooling" bank accounts. After depositing the proceeds into bank accounts they controlled, the defendants and their co-conspirators would distribute the monies among themselves via cash withdrawals and/or other transfers.

16. It was also part of their conspiracy and their schemes to defraud that the fraudulently obtained money transfers were converted to checks and cash by the defendants and their co-conspirators at numerous MoneyGram Outlets in the Greater Toronto Area, including but not limited to:

A1 COPY CENTRE, ALL IN ONE CONVENIENCE STORE, ALPHA ACCOUNTING, ATOE ENTERPRISES, CANADA CASH, CASH 3430, DELTA CASH, DIGICELL 2000, DOLLAR LAND, EBI RENTALS, FAMILY SUPPORT ORAGANIZATION, FRONT PAGE BEAUTY SUPPLY, GOLD AND JEWEL COMPUTER CON, GTA FOREIGN EXCHANGE SERVICE, INTER CHANGE SERVICES, JOY BEAUTY SALON, KLAZZ BEAUTY SALON, KUDDIES EXCLUSIVE, MAC INTERNET CAFÉ & COMMUNICATION, MAJEK SOLUTIONS INC, MODICOM ACCOUNTING SERVICES, MONEY SPOT – MONEY SPOT 11, MULTILINK COMMUNICATION, N AND E ASSOCIATES AND FINANCIAL, NHF ENTERPRISE, PREET VIDEO AND ELECTRONICS, ROSEM BUSINESS SERVICES, ST CLAIR DOLLAR PLUS, SUNSHINE DIGITAL PHOTO AND VIDEO, VIDEO SUPPERMART, and T.I. WIRELESS POINT

IV. OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

The defendants and their conspirators committed the following overt acts in furtherance of their conspiracy and schemes to defraud:

17. On diverse occasions during the course of the conspiracy the defendants and their conspirators paid MoneyGram money transfers that were entered into the MoneyGram system by the unwitting victims of mass marketing fraud schemes. A relatively small percentage of the victims, approximately 10%, filed complaints with MoneyGram after they realized they had been defrauded. The table below lists the total payments, the number of fraud complaints, and the total fraud complaint payments at MoneyGram Outlets owned or controlled by the defendants and their conspirators during the specified time periods:

	Time Period	Total Payments	Time Period	Fraud Complaints	Complaint Amount
Money Spot 5 (James UGOH)	3/06 - 2/09	\$619,514	1/07 - 5/09	84	\$81,884
Money Spot 6 (James UGOH)	9/06 - 2/09	\$142,611	1/07 - 5/09	19	\$15,562
Money Spot 7 (James UGOH)	3/07 - 2/09	\$3,159,303	1/07 - 5/09	176	\$272,979
Money Spot 8 (James UGOH)	4/07 - 2/09	\$105,132	1/07 - 5/09	17	\$10,960
Money Spot 9 (James UGOH)	6/07 - 2/09	\$154,218	1/07 - 5/09	8	\$14,140
Money Spot 11 (James UGOH)	3/08 - 2/09	\$66,174	1/07 - 5/09	3	\$6,343
N&E Associates (James UGOH)	7/04 - 2/09	\$2,042,348	1/07 - 5/09	84	\$164,955
Kuddies Exclusive	11/07 - 2/09	\$4,011,237	1/07 - 5/09	249	\$521,659
All In One Store (A. OGUNFUNWA)	10/07 - 3/09	\$1,873,160	1/07 - 5/09	154	\$257,411

	Time Period	Total Payments	Time Period	Fraud Complaints	Complaint Amount
Video Suppermart (A. OGUNFUNWA)	10/07 - 3/09	\$3,899,897	1/07 - 5/09	364	\$514,080
Modicom Accounting (Felix MORDI)	5/05 - 6/06	\$2,632,744	5/05 - 6/06	90	\$240,859
EBI Rentals	10/06 - 3/09	\$781,297	1/07 - 5/09	38	\$54,195
totals		\$19,487,635		1,286	\$2,155,027

18. On diverse occasions during the course of the conspiracy the defendants and their conspirators converted the monies entered into the MoneyGram system by the victims of mass marketing schemes by issuing MoneyGram checks payable to business entities they owned or operated. The defendants would then deposit these checks into bank accounts they controlled in the greater Toronto area before eventually distributing the monies among themselves. The table below summarizes the MoneyGram checks (in Canadian dollars) the defendants and their conspirators issued to 3 business entities they controlled during the course of the conspiracy:

	MoneyGram Check Issued To:					
Issued By:	Klazz Beauty Salon (Kayote Kassim)		KC Money Transfer (Kayote Kassim)		Modicom Acct. Services (Felix Mordi)	
	<i>checks</i>	<i>total</i>	<i>checks</i>	<i>total</i>	<i>checks</i>	<i>Total</i>
Money Spot 5 (James Ugoh)	75	\$53,085	5	\$3,031	199	\$162,780
Money Spot 6 (James Ugoh)	20	\$13,054	0	\$0	43	\$28,490
Money Spot 7 (James Ugoh)	202	\$383,442	24	\$12,095	758	\$1,399,383
Money Spot 8 (James Ugoh)	34	\$17,468	10	\$7,479	86	\$48,041

	MoneyGram Check Issued To:					
Issued By:	Klazz Beauty Salon (Kayote Kassim)		KC Money Transfer (Kayote Kassim)		Modicom Acct. Services (Felix Mordi)	
	<i>checks</i>	<i>total</i>	<i>checks</i>	<i>total</i>	<i>checks</i>	<i>Total</i>
Money Spot 9 (James Ugoh)	16	\$28,059	0	\$0	29	\$47,738
Money Spot 11 (James Ugoh)	15	\$38,810	0	\$0	11	\$26,607
N&E Associates (James Ugoh)	47	\$37,013	42	\$34,280	232	\$484,902
Kuddies Exclusive	610	\$1,256,862	549	\$1,095,664	156	\$329,254
All in One Store (A. Ogunfunwa)	212	\$409,903	168	\$332,762	158	\$296,068
Video Suppermart (A. Ogunfunwa)	552	\$879,879	446	\$779,415	249	\$460,331
EBI Rentals	0	0	0	0	205	\$134,139
totals	1,783	\$3,117,575	1,244	\$2,264,726	2,126	\$3,417,733

19. On January 15, 2009, KAYOTE KASSIM travelled from the Video Suppermart Store, 1950 Eglinton Ave West, Toronto, to a local branch office of the Bank of Montreal where he made the following deposits:

a) 18 MoneyGram Money Transfer checks (7 from Video Suppermart, 8 from Kuddies Exclusive , and 3 from Majek Solutions) payable to Klazz Beauty Salon totaling \$36,149 (cdn) into the Klazz Beauty Salon business account, and

b) 15 MoneyGram Money Transfer checks (3 from All In One Store, 12 from Video Suppermart) payable to KC Money Transfer totaling \$33,990 (cdn) into the KC Money Transfer business account.

20. On January 23, 2009, KAYOTE KASSIM travelled from the Video Suppermart Store, 1950 Eglinton Ave West, Toronto, to a local branch office of the Bank of Montreal where he made the following deposits:

a) 10 Video Suppermart MoneyGram Money Transfer checks payable to Klazz Beauty Salon totaling \$12,162 (cdn) into the Klazz Beauty Salon business account, and

b) 14 MoneyGram Money Transfer checks (3 from Video Suppermart, 6 from Kuddies Exclusive, 4 from Majek Solutions, and 1 from Money Spot 7) payable to KC Money Transfer totaling \$32,258 (cdn) into the KC Money Transfer business account.

All in violation of Title 18, United States Code, Section 371.

COUNTS 2 - 16
(Mail Fraud)

The Grand Jury Further Charges:

1. The information and allegations set forth in Count 1 of this Indictment are specifically incorporated herein.
2. Between January of 2004 and April of 2009, in the Middle District of Pennsylvania and elsewhere, the defendants,

**KAYODE KASSIM,
 FELIX MORDI,
 ABEL OGUNFUNWA, and
 JAMES UGOH**

and other conspirators, known and unknown to the Grand Jury, did devise a scheme or artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, as described in Count 1 of this Indictment, and for the purpose of executing such scheme or artifice, on or about the dates set forth below, did cause any matter or thing whatever to be deposited in the U.S. Mail and delivered according to the direction thereon, as described below:

Count	Date	Sender	Item Mailed	Delivered To
2	8/8/06	Swiss Gaming Commission Canada	\$2,376,000 Prize Notification and \$2,992 check	V. Herbst ***** ¹ Lehighton, PA 18235

¹ Street Address redacted for Victim privacy.

Count	Date	Sender	Item Mailed	Delivered To
3	1/24/07	iRecruit Canada	"Customer Service Evaluator" transmittal letter and \$3,250 check	C. Mertz ***** Mifflinburg, PA 17844
4	3/13/07	Mystery Shops Canada	"Secret Customer" transmittal letter and \$4,850 check	N. Cruz ***** Sugarloaf, PA 18249
5	7/27/07	Global Logistics Inc. Canada	\$250,000 Prize Notification and \$3,985 check	L. Silverwood ***** Chambersburg, PA 17201
6	9/20/07	Sunrise Health Care Management Inc. Canada	\$250,000 Prize Notification and \$5,055 check	B. Webb ***** Moosic PA 18507
7	1/02/08	Quality Service Canada	"Secret Customer" transmittal letter and \$2,850 check	D. Dippery ***** Dover, PA 17315
8	1/17/08	Financial Bureau Canada	\$750,000 Prize Notification and \$4,950 check	D. Torres ***** Stroudsburg, PA 18360
9	3/24/08	Fido Marketing Solutions Inc. Canada	\$180,000 Prize Notification and \$4,365 check	R. Kachev ***** Harrisburg, PA 17111
10	9/1/08	Pinnacle Financial Ltd. Canada	\$50,000 Prize Notification and \$3,900 check	L. Kolodzieski ***** Clark Summit, PA 18411
11	10/15/08	RN Financials Canada	\$39,000 Prize Notification letter and \$3,900 check	S. Fisher ***** Jim Thorpe, PA 18229
12	11/7/08	Citi Management Services Canada	"Secret shopping" transmittal letter and \$3,990 check	R Minier ***** Lairdsville, PA 17742
13	11/17/08	HSBC Financials Canada	\$75,810 Prize Notification and \$3,995 check	K. Hessler ***** Montgomery, PA 17752

Count	Date	Sender	Item Mailed	Delivered To
14	11/17/08	Oceanic Financial Group Canada	\$55,000 Prize Notification and \$3,875 check	D.Leach ***** Milford, PA 18337
15	12/10/08	Business Consulting Inc.Canada	"Mystery Customer" Transmittal letter and \$4,996 check	S. Craig ***** Bloomsburg, PA 17815
16	2/20/09	SDG Financial Inc. Canada	\$60,000 Prize Notification and \$4,875 check	D. Candela ***** Mount Pocono, PA 18344

All in violation of Title 18, United States Code, Section 1341, Section 2.

COUNTS 17-34
(Wire Fraud)

The Grand Jury Further Charges:

1. The information and allegations set forth in Count 1 of this Indictment are specifically incorporated herein.
2. Between January of 2004 and April of 2009, in the Middle District of Pennsylvania and elsewhere, the defendants,

**KAYODE KASSIM,
FELIX MORDI,
ABEL OGUNFUNWA, and
JAMES UGOH**

and other conspirators, known and unknown to the Grand Jury, did devise a scheme or artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, as described in Count 1 of this Indictment, and, on or about the dates set forth below, did cause to be transmitted by means of wire, radio, or television communication in interstate and foreign commerce, any writing, sign, signal, picture or sound for the purpose of executing such scheme or artifice, as described below:

Count	Date	MoneyGram Wire Communication			
		From	Intended Recipient/Location	Transfer Amount	Reference #
17	9/27/07	B. Webb Moosic, PA	M. Paul	\$2,955	53921977
18	3/24/08	R. Kachev Harrisburg, PA	K. Ostiva	\$980	93236178
19	4/23/08	R. Kramer Palmyra, PA	J. Frankstin	\$900	60394977
20	8/14/08	R. Conklin Tunkhannock, PA	A. Palmer	\$785	80275810
21	8/15/08	A. Shultz, Montandon, PA	B. Spence	\$3,150	87394464
22	9/22/08	E. Houtz State College, PA	M. Houtz	\$1,400	47200621
23	9/25/08	C. Rhine St. Clair, PA	B. Wilclay	\$965	92772059
24	10/8/08	D. Gauger Lewisburg, PA	S. Edwards	\$950	93419930
25	10/15/08	S. Fisher Lehighton, PA	M. Morton	\$3,300	18199223
26	10/18/08	G. Brill Jr. Shenandoah, PA	B. Passe	\$1,040	79379412
27	11/07/08	R. Minier/ Montoursville, PA	A. Bower	\$2,995	81011732
28	11/17/08	K. Hessler Lewisburg, PA	S. Cochen	\$2,900	84006669
29	11/17/08	D. Leach Milford, PA	D. Granata	\$2,935	90419605
30	12/18/08	J. Lamoreaux Wilkes-Barre, PA	J. Mkquire	\$920	55807710
31	12/19/08	D. Williams Northumberland, PA	S. Chester	\$3,215	48651061
32	1/7/09	D. Bierly, York, PA	C. Phillis	\$930	45071842
33	1/24/09	M. Shadler St. Clair, PA	J. Layfield	\$960	75359964
34	2/12/09	J. Nace Elizabethville, PA	J. Falkland	\$960	27231639

All in violation of Title 18, United States Code, Sections 2 and 1343.

COUNTS 35-50
(Laundering of Monetary Instruments)

The Grand Jury Further Charges:

1. The information and allegations set forth in Count 1 of this Indictment are specifically incorporated herein.
2. Between January of 2004 and April of 2009, in the Middle District of Pennsylvania and elsewhere, the defendants,

**KAYODE KASSIM,
FELIX MORDI,
ABEL OGUNFUNWA, and
JAMES UGOH**

and other conspirators, known and unknown to the Grand Jury, did cause monetary instruments or funds to be transported, transmitted, or transferred from a place in the United States to or through a place outside the United States knowing that the monetary instrument or funds involved in the transportation, transmission or transfer represented the proceeds of some form of unlawful activity, and knowing that such transportation, transmission, or transfer was designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity; to wit, mail fraud and wire fraud as alleged in this Indictment, as described on or about the dates set forth below:

Count	Date	Funds	MoneyGram International Funds Transfer	
			Sender/U.S. Outlet	Check Payee / Canadian Outlet
35	9/27/07	\$2,995 (usd) \$2,850 (cdn)	B. Webb Pittston, PA	Modicom Accounting Service Money Spot 7
36	3/29/08	\$980 (usd) \$957 (cdn)	R. Kachev Harrisburg, PA	Modicom Accounting Service MoneySpot 7
37	4/22/08	\$700 (usd) 675 (cdn)	R. Kramer Palmyra, PA	Klazz Beauty Salon Inc. Video Suppermart Store
38	6/13/08	\$450 (usd) \$441 (cdn)	J. Maszeroski Pittston, PA	Klazz Beauty Salon Inc. MoneySpot 5
39	5/29/08	\$1,000 (usd) \$ 948(cdn)	L. Kline Palmyra, PA	Modicom Accounting Service MoneySpot 5
40	10/29/08	\$5,500 (usd) \$6,711 (cdn)	E. Houtz State College, PA	KC MoneyTransfer Inc. Kuddies Exclusive
41	10/30/08	\$965 (usd) \$1,132 (cdn)	C. Hayes Mechanicsburg, PA	KC MoneyTransfer Inc. Video Suppermart Store
42	10/22/08	\$3,300 (usd) \$3,836 (cdn)	S. Fisher Lehighon, PA	Modicom Accounting Service Cash 3430
43	10/31/08	\$5,000 (usd) \$5,753 (cdn)	E. Houtz State College, PA	KC MoneyTransfer Inc. Kuddies Exclusive
44	11/11/08	\$800 (usd) \$914 (cdn)	V. Horsfield Coal Township, PA	KC MoneyTransfer Inc. Video Suppermart Store
45	11/12/08	\$2,995 (usd) \$3,463 (cdn)	R. Minier Montoursville, PA	KC MoneyTransfer Inc. Kuddies Exclusive
46	11/17/08	\$800 (usd) \$947 (cdn)	C. Rosario Dickson City, PA	Klazz Beauty Salon Inc. Kuddies Exclusive
47	11/26/08	\$2,900 (usd) \$3,413 (cdn)	K. Hessler Lewisburg, PA	Modicom Accounting Service Video Suppermart Store
48	11/28/08	\$2,935 (usd) \$3,461 (cdn)	D. Leach Milford, PA	Modicom Accounting Service Atoe Enterprises
49	1/7/09	\$930 (usd) \$1,054 (cdn)	D. Bierly York, PA	Klazz Beauty Salon Inc. Video Suppermart Store
50	1/26/09	\$1,000 (usd) \$1,179 (cdn)	M. Shadler Saint Clair, PA	Klazz Beauty Salon Inc. Video Suppermart Store

All in violation of Title 18, United States Code, Section 1956(a)(2).

[illegible]